



Addendum 4 - VI Mitigation Work Plan

South Dayton Dump and Landfill Site
Moraine, Ohio

Submitted to:
US EPA Region 5
Emergency Response Branch
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Table of Contents

1.	Introduction.....	1
2.	Sampling Activities	2
2.1	Annual Proficiency Sampling	2
2.2	Monitoring Schedule	3

Figure Index

- Figure 4.1 – 1951 Dryden Road, Parcel 5171, Building 8
- Figure 4.2 – 1951 Dryden Road, Parcel 5171, Building 9
- Figure 4.3 – 2015 / 2019 Dryden Road, Parcel Number 5172, Building 12
- Figure 4.4 – 2003 Dryden Road, Parcel Number 5172, Building 14
- Figure 4.5 - 2031 Dryden Road, Parcel Number 5173, SIM Trainer Building 15
- Figure 4.6 – 2075 Dryden Road, Parcel Number 5175, Building 17
- Figure 4.7 – 2215 East River Road, Parcel Number 3207, Building 24

Table Index

Table 1 Proposed Annual Hybrid Sampling Locations

1. Introduction

This addendum to the Vapor Intrusion (VI) Mitigation Work Plan (CRA, May 2013) for the South Dayton Dump and Landfill Site (Site), Moraine, Ohio is intended to update the existing VI Mitigation Work Plan. The purpose of this addendum update is to describe hybrid proficiency sampling for annual monitoring events for buildings in which sub-slab (SS) soil vapor concentrations remain greater than applicable screening levels. The monitoring program will be implemented in 2017 as outlined herein.

With the exception of Building 17, the sub-slab depressurization systems (SSDSs) in all buildings have been upgraded or modified at least once in response to observed conditions. The dates of SSDS installation and upgrades for all buildings are summarized in Table A below.

Table A Summary of SSDS installation and upgrades

Building	Date of SSDS installation completion	SSDS Upgrade 1	SSDS Upgrade 2	SSDS Upgrade 3
Building 8	8/21/2013	11/27/2013	2/5/2016	Not Applicable
Building 9	9/30/2013	2/5/2016	Not Applicable	
Building 12 – Overstreet Painting	9/30/2013	12/6/2013	3/6/2014	4/11/2016
Building 12 – S&J Precision	9/30/2013	12/20/2013	3/6/2014	4/7/2016
Building 14	12/20/2013	1/9/2014	3/26/2014	4/6/2016
Building 15	01/09/2014	01/09/2014	03/26/2014	04/06/2016
Building 17	12/18/2013	Not Applicable		
Building 24	8/21/2013	2/13/2016	Not Applicable	

Continued operation and maintenance of the SSDSs is required and includes quarterly system checks and vacuum blower maintenance, as needed.

SS concentrations in Buildings 15 and 17 were less than the Ohio Department of Health (ODH) screening levels in the last sampling event completed in 2016. In July 2015, Building 14 concentrations were less than ODH screening levels for all samples; however, the June 2016 SS concentrations were greater than ODH screening levels, and have increased compared to previous results, including the 2012 pre-mitigation concentrations. United States Environmental Protection Agency (USEPA) and Respondents agree to complete adjustments to the Building 14 SSDS valves in order to obtain optimal vacuum response and complete confirmatory sampling afterwards.

Although the SS concentrations in Buildings 8, 9, and 12 remain greater than ODH screening levels, the concentrations have decreased significantly in comparison to the pre-mitigation results, with the exception of Building 12 - Overstreet Painting¹(see Figures 4.1 to 4.3). On a VI conference call held

¹ The Respondents will complete valve and vacuum adjustments in Building 12 – Overstreet Painting and collect confirmatory samples.



on August 4, 2016, Respondents and USEPA acknowledged that SS concentrations remain greater than ODH screening levels in Buildings 8, 9, and 12. However, there are no vapor-intrusion related indoor air (IA) exceedances in these buildings and the intent of the Removal ASAOC has been met.

USEPA and Respondents agreed that no further modifications to the SSDSs were required in these buildings, with the exception of valve and vacuum adjustments in Building 12 - Overstreet Painting. USEPA requested that the Respondents develop an annual hybrid sampling program that is protective IA for buildings where the SS concentrations remain greater than applicable screening levels (i.e., Buildings 8, 9, and 12). This addendum details the annual hybrid sampling program. This addendum is intended to be used in conjunction with the VI Mitigation Work Plan and is not a stand-alone document.

2. Sampling Activities

2.1 Annual Proficiency Sampling

For annual proficiency sampling events in buildings where the SS concentrations remain greater than applicable screening levels (i.e., Buildings 8, 9, and 12), Respondents will collect IA and SS samples. Respondents propose to collect SS samples to obtain analytical confirmation that IA exceedances (e.g., benzene, xylenes) result from business activities, and not due to vapor intrusion. Based on the continuing and significantly reduction in SS exceedances, Respondents and USEPA agree that additional SSDS modifications will not be required so long as no VI-related indoor air exceedances are identified.

Samples will be collected from the lowest floor in the building; in all cases, this is the main floor of the buildings. An outdoor ambient air sample will be collected concurrently with the IA and SS samples from an upwind location on each building property. The proposed annual proficiency sampling locations were chosen based on the following criteria:

- SS probe locations from which chemical concentrations were greater than ODH screening levels and IA proximity to these locations
- Proximity to occupied spaces (i.e., offices, break rooms, etc.)

Proposed annual sampling locations for all buildings are presented in Table 1, and on Figures 4.1 to 4.7. The USEPA will have the opportunity to approve or modify the proposed locations and may elect to collect split-SS samples or to collect SS or IA samples at other locations.

When SS concentrations in any building has declined to less than ODH screening levels, the Respondents will complete IA sampling only in accordance with Section 4.5.2 of the VI Mitigation Work Plan. The VI Mitigation Work Plan Monitoring Program specifies completion of IA sampling at a subset (20 percent of the operating systems and approved by USEPA prior to scheduling) of the buildings at an annual frequency from the date of SSDS installation, provided the SSDS is still required.

GHD will collect annual proficiency samples in accordance with the existing VI Mitigation Work Plan procedures. Indoor air and SS soil vapor sample collection is addressed in Sections 3.3 and 3.4,



respectively, of the VI Mitigation Work Plan. Sample analysis is addressed in Section 3.7 of the VI Mitigation Work Plan.

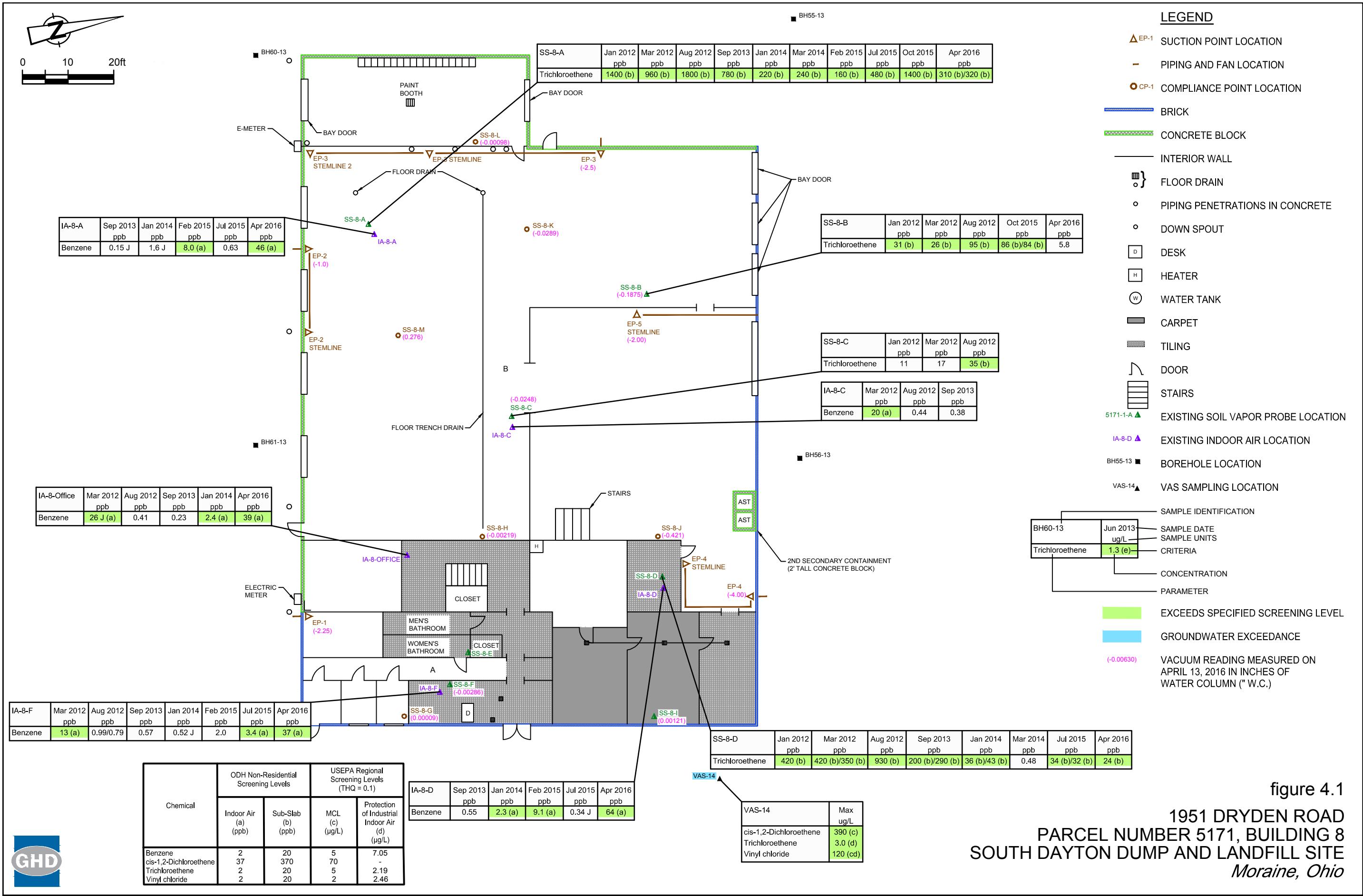
2.2 Monitoring Schedule

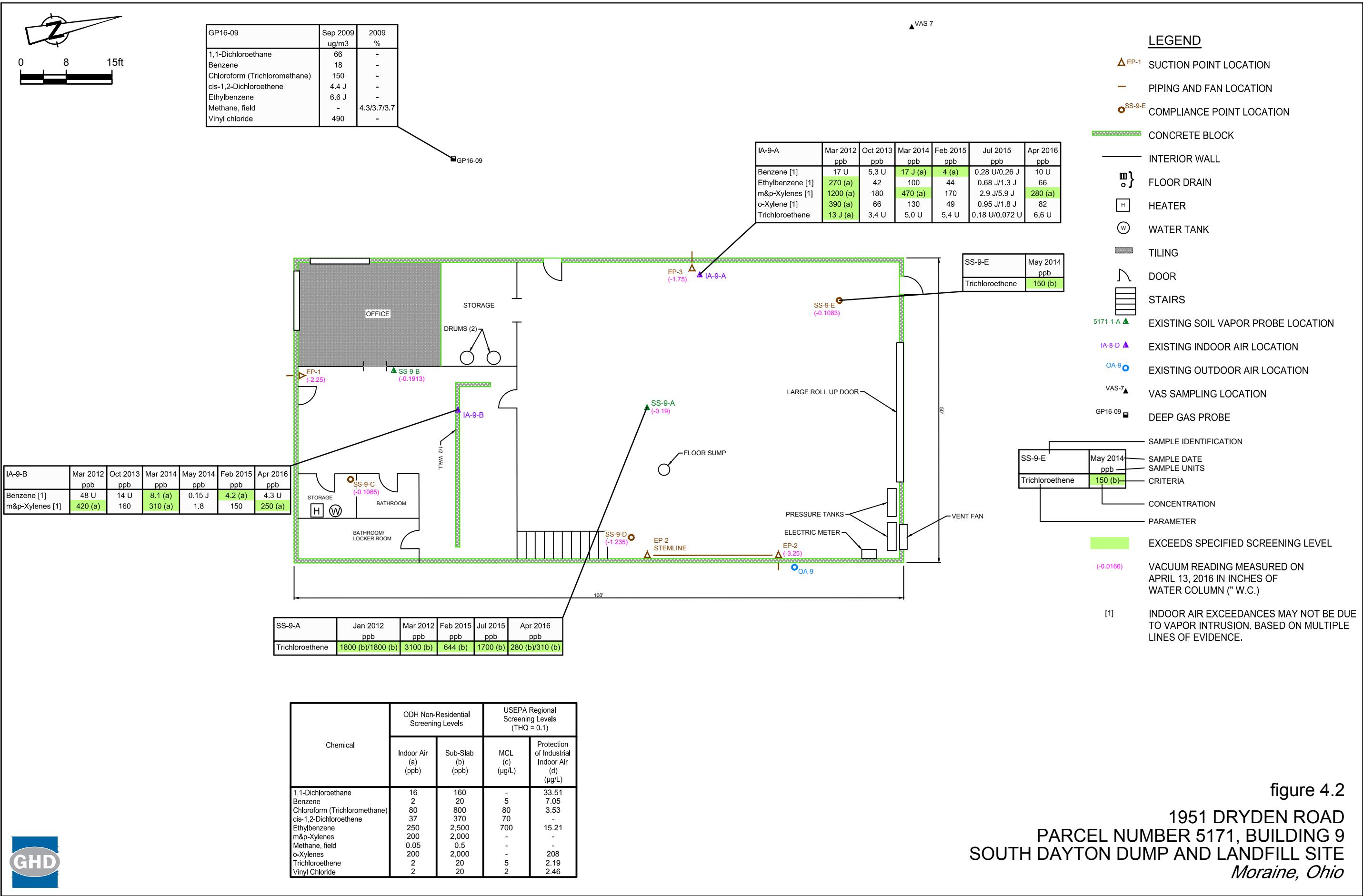
Annual monitoring will be conducted according to the following schedule.

February: Buildings 17 and 24

July: Buildings 8, 9, 12, 14, and 15

The annual monitoring results will be assessed and presented to the agencies, with recommendations for future monitoring.





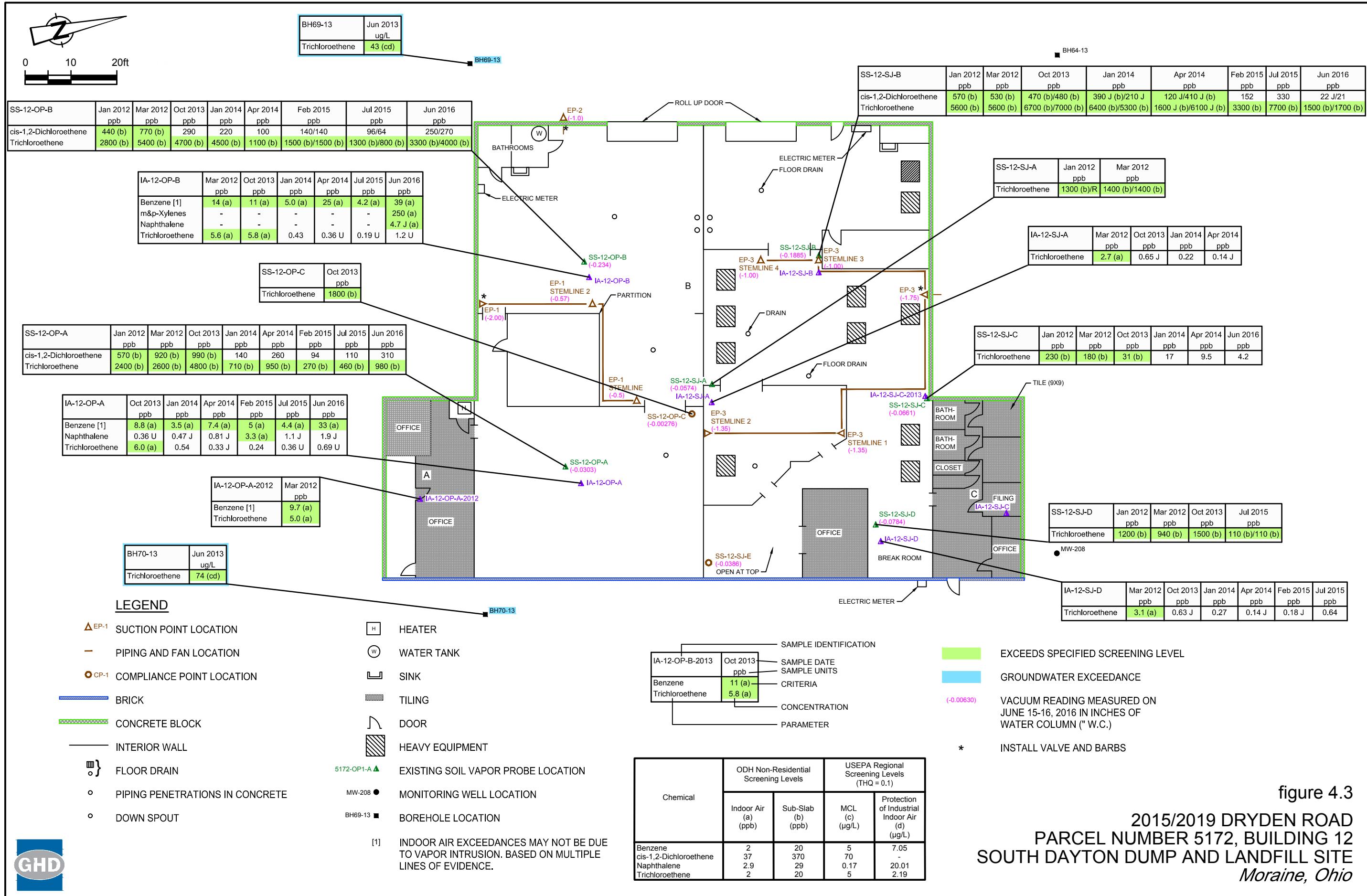
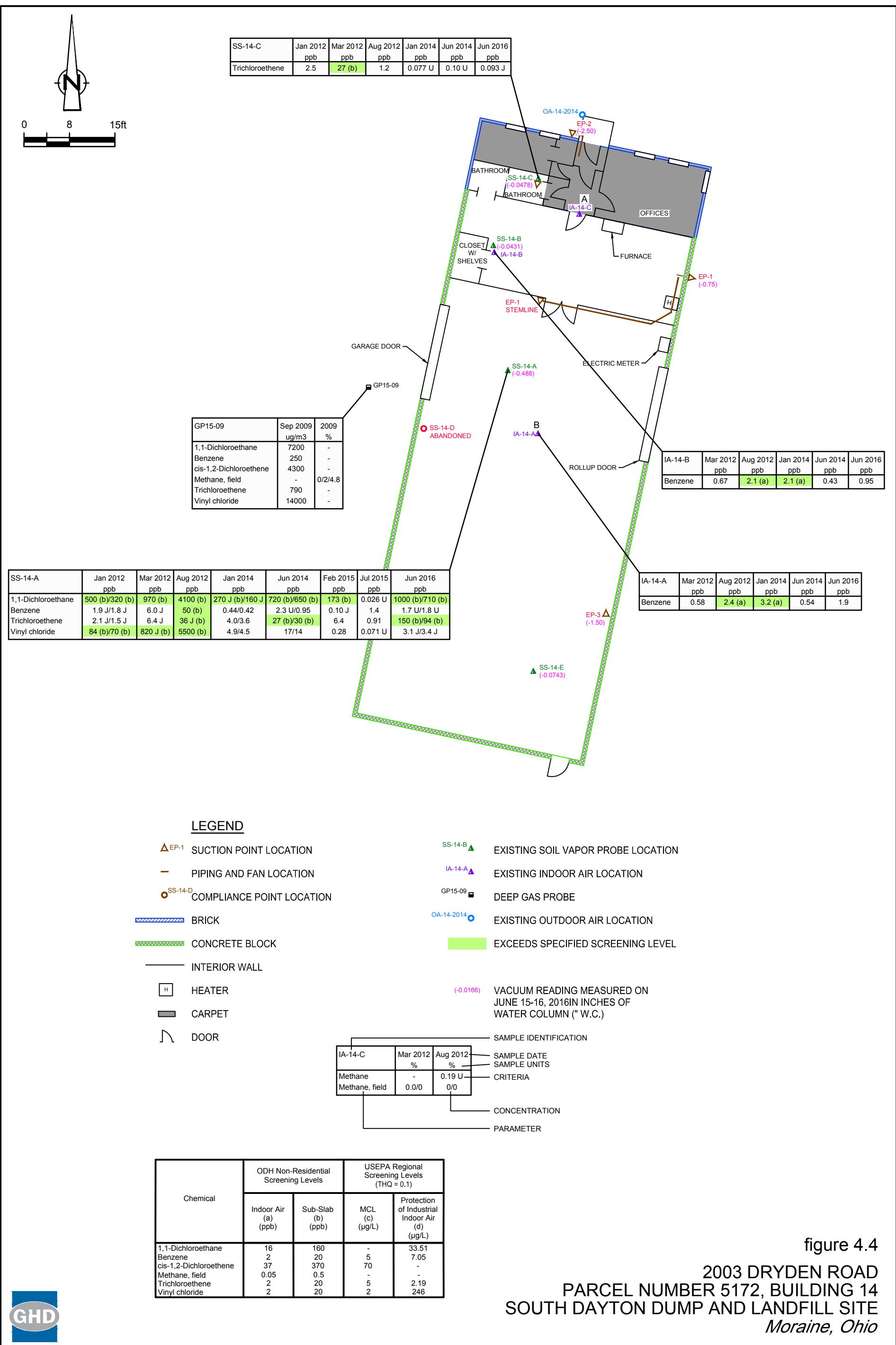
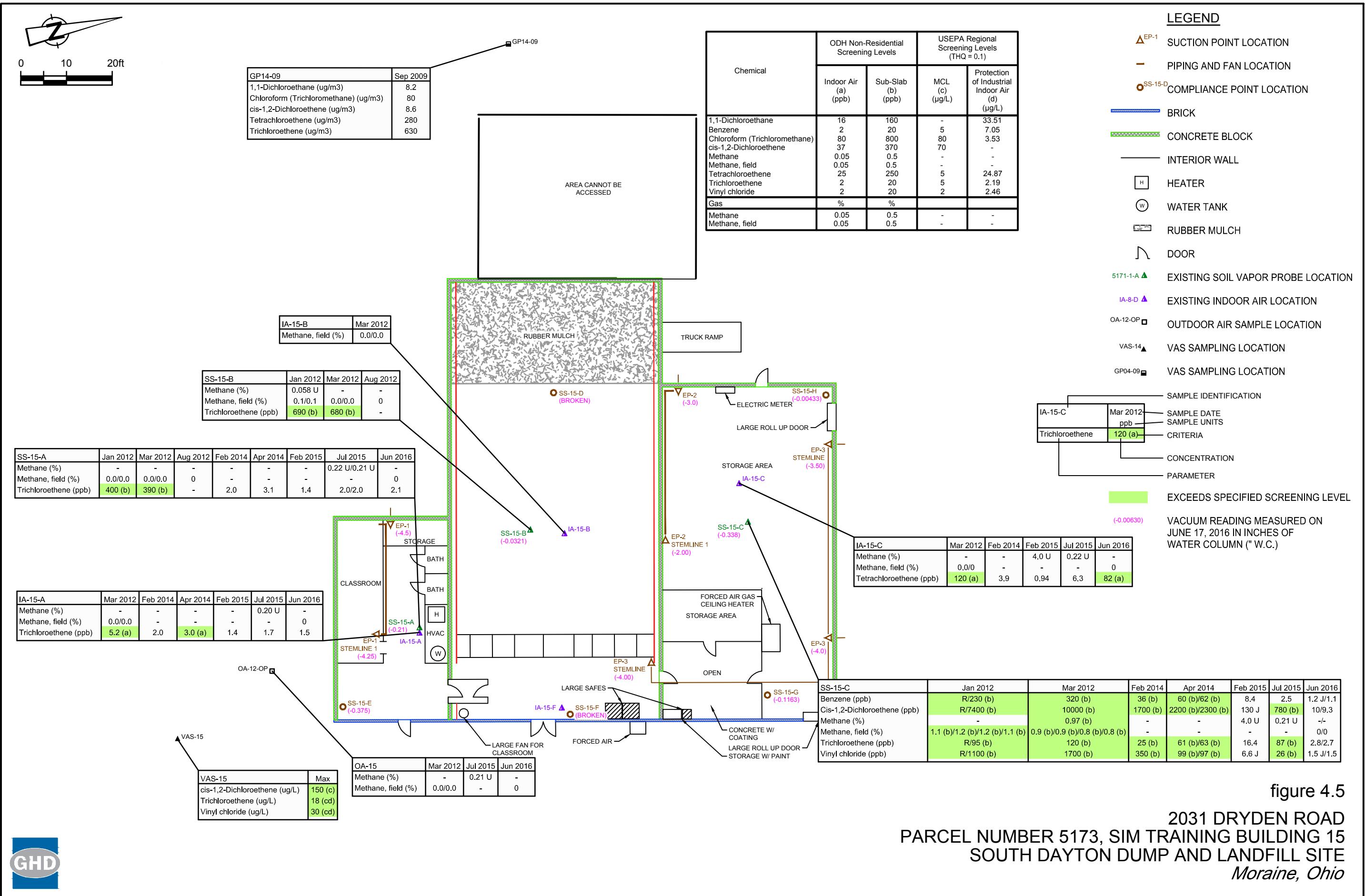


figure 4.3

2015/2019 DRYDEN ROAD
PARCEL NUMBER 5172, BUILDING 12
SOUTH DAYTON DUMP AND LANDFILL SITE
Moraine, Ohio





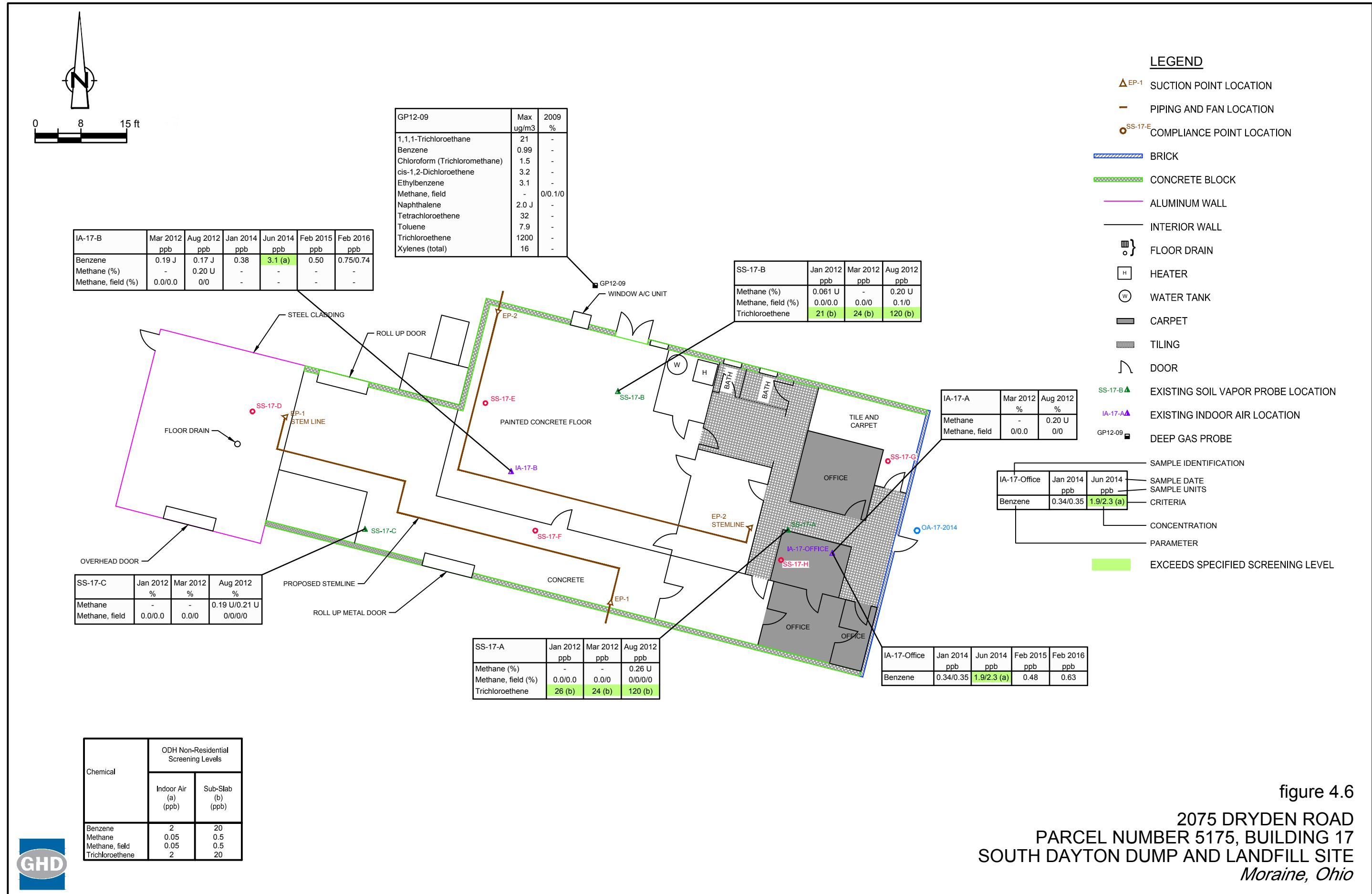


figure 4.6

**2075 DRYDEN ROAD
PARCEL NUMBER 5175, BUILDING 17
SOUTH DAYTON DUMP AND LANDFILL SITE
*Moraine, Ohio***

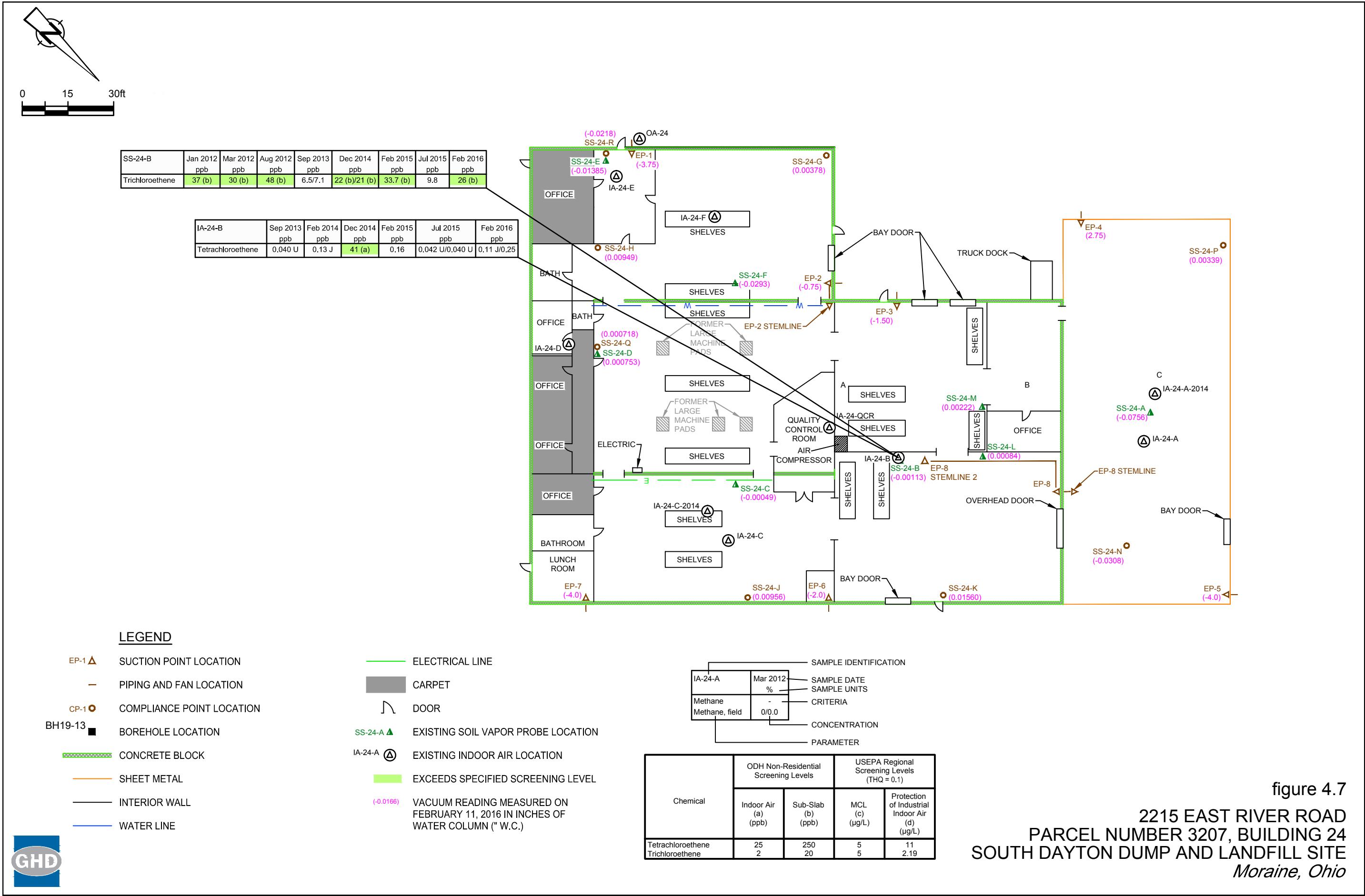


figure 4.7
2215 EAST RIVER ROAD
PARCEL NUMBER 3207, BUILDING 24
SOUTH DAYTON DUMP AND LANDFILL SITE
Moraine, Ohio

Table 1

Proposed Annual Hybrid Sampling Locations
South Dayton Dump and Landfill Site
Moraine, Ohio

Bldg No.	Current Vacuum	Current SS Exceedances	Current IA Exceedance	VI occurring?	Previous Proficiency Sample Locations	Proposed Annual Sampling Locations	Notes
8	Acceptable with exception of SS-8-G to SS-8-I, SS-8-L, and SS-8-M	TCE	Benzene	No	SS-8-A SS-8-B SS-8-D IA-8-A IA-8-Office IA-8-D IA-8-F	SS-8-A IA-8-A IA-8-Office IA-8-D IA-8-F	Continued sampling at SS-8-A proposed in order to provide analytical evidence that IA exceedances of Benzene are not due to VI, and to monitor SSDS
9	Acceptable	TCE	Benzene Xylenes	No	SS-9-A IA-9-A IA-9-B	SS-9-A IA-9-A IA-9-B	Continued sampling at SS-9-A proposed in order to provide analytical evidence that IA exceedances of Benzene and Xylenes are not due to VI, and to monitor SSDS.
12 OP	Acceptable	TCE	Benzene Xylenes Naphthalene	No	SS-12-OP-A SS-12-OP-B IA-12-OP-A IA-12-OP-B	SS-12-OP-A SS-12-OP-B IA-12-OP-A IA-12-OP-B IA-12-OP-Office	IA-12-OP-Office was added to monitor IA air quality in an area anticipated to involve the greatest worker occupancy
12 SJ	Acceptable	TCE	None	No	IA-12-SJ-A IA-12-SJ-B (2015) IA-12-SJ-C IA-12-SJ-D SS-12-SJ-B SS-12-SJ-C	IA-12-SJ-A (machine area) IA-12-SJ-D (Break Room) IA-12-SJ-C (Office filing area) IA-12-SJ-C-2013 (machine area) SS-12-SJ-B	SS-12-SJ-C was removed as there have been no exceedances from this probe since January 2014
14	Acceptable	1,1-DCA TCE	Benzene	No	SS-14-A IA-14-A IA-14-B IA-14-C	SS-14-A IA-14-A IA-14-B IA-14-C	Rationale: Although sub-slab vacuums are now at or better than -0.004" w.c., continued SS sampling at SS-14-A is proposed to obtain analytical data to prove that any IA exceedances are not due to VI.
15	Acceptable	N/A	PCE	No	IA-15-A IA-15-C IA-15-F SS-15-A SS-15-C	IA-15-A IA-15-C IA-15-F SS-15-A SS-15-C	No changes proposed
17	Acceptable	N/A	None	No	IA-17-A IA-17-B IA-17-Office	IA-17-A IA-17-B IA-17-Office	No changes proposed
24	Acceptable with exception of SS-24-C, SS-24-D, SS-24-G to SS-24-M, SS-24-P, and SS-24-Q	TCE	None	No	IA-24-A IA-24-B IA-24-C IA-24-D IA-24-F	IA-24-B IA-24-D	Reduced IA sampling proposed based on the lack of IA exceedances in previous sampling rounds back to 2012. SS exceedances at SS-24-B are less than the ODH Screening Levels (AF=33). IA-24-D proposed based on location in offices, and IA-24-B is proposed based on proximity to worst-case probe and previous PCE exceedance

Note:

Vacuum acceptability: better than -0.004" w.c.

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